



December 9, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Dominion Energy South Carolina, Incorporated's Request for "Like Facility" Determinations Pursuant to S.C. Code Ann. § 58-33-110(1) and Waiver of Certain Requirements of Commission Order No. 2007-626
Docket 2021-93-E

Dear Ms. Boyd:

On November 10, 2021, Dominion Energy South Carolina, Inc. ("DESC" or "Company") filed with the Public Service Commission of South Carolina ("Commission") a Partial Settlement Agreement that the Company entered into with all parties of record in the above-referenced docket. In its November 10, 2021 letter, the Company requested that the Commission approve the Partial Settlement which, among other things, reflected the parties' agreement that the Commission should grant the relief requested by DESC with respect to the Parr and Bushy Park Units such that neither further proceedings under the Utility Facility Siting and Environmental Protection Act nor a request for proposal ("RFP") under Commission Order No. 2007-626 or 2018-804(A) shall be required for these units. On December 1, 2021, the Commission issued an order holding the procedural deadlines in abeyance and continuing the December 9, 2021 hearing so that DESC can issue an All Source RFP for the Urquhart replacement units. *See* Commission Order No. 2021-782. While the Commission acknowledged the existence of the Partial Settlement Agreement in Order No. 2021-782, the Commission did not take any action regarding the Partial Settlement Agreement but instead ruled that the Partial Settlement Agreement "[r]emains pending before the Commission and subject to consideration in the future." *Id.* As of the date of this letter, the Commission has not taken any action regarding the Partial Settlement Agreement.

The purpose of this letter is to respectfully request that the Commission include DESC's request for approval of the Partial Settlement Agreement on its next Commission Business Meeting agenda and approve the Partial Settlement

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Agreement. Of note, the next Commission Business Meeting has not yet been scheduled but has been left to scheduling at the call of the Chairman.

The Partial Settlement represents considerable efforts on behalf of the parties to reach agreement on certain issues which includes an agreement that the Parr and Bushy Park Units should be determined by the Commission to be a “like facility” under S.C. Code Ann. § 58-33-110 (2012). Moreover, as explained in the verified pre-filed direct testimony of Andrew R. Walker, the Parr and Bushy Park Units are at the end of their operational lives and are not suitable for intra-day peaking and load following use as the DESC system requires as it continues to integrate intermittent renewable energy sources. Equally important, is that the Parr Units are used to provide dedicated, independent 115 kilovolt service to support V.C. Summer Unit 1 and serves as a reliable source of power to support nuclear safety-functions in case of grid failure. With respect to Bushy Park, the replacement unit will provide black start capacity for DESC’s Southern Region and will also support voltage regulation in the DESC Southern Region. In short, the replacement units at Parr and Bushy Park are critical to the Company’s continuing efforts to provide safe and reliable service to its customers, and it is imperative that the Company replace the existing units in a timely manner.

In light of the importance of these units, the Company is planning for the replacement units at Bushy Park and Parr to enter service as soon as possible. There are, however, many critical milestones that the Company must accomplish in early 2022 to maintain its negotiated contracts for turbine equipment supply and engineering, procurement, and construction services and to mitigate any potential cost increases due to additional delay. Therefore, the Company respectfully requests that the Commission include DESC’s request for approval of the Partial Settlement Agreement on its next Commission Business Meeting agenda and approve the Partial Settlement so that DESC can timely execute its strategy to replace the existing Parr and Bushy Park units.

Please be advised that I have been authorized to inform the Commission that the Carolinas Clean Energy Business Association, the Sierra Club, the South Carolina Coastal Conservation League, the Southern Alliance for Clean Energy, and BrightNight, LLC consent to DESC’s request.

Thank you for your consideration of the Company’s request. If you have any questions or need additional information, please do not hesitate to contact us.

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Very truly yours,



K. Chad Burgess

KCB/kms

cc: All Parties of Record
(all via electronic mail only)